

1 AARON D. FORD  
Attorney General  
2 JARED M. FROST (Bar No. 11132)  
Senior Deputy Attorney General  
3 State of Nevada  
Office of the Attorney General  
4 555 East Washington Avenue, Suite 3900  
Las Vegas, Nevada 89101  
5 (702) 486-3177 (phone)  
(702) 486-3773 (fax)  
6 Email: jfrost@ag.nv.gov

7 *Attorneys for Defendants*  
*Jay Barth and Kyle Groover*  
8  
9  
10  
11

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 SAUL FARVELA,

15 Plaintiff,

16 v.

17 JAY BARTH, *et al.*,

18 Defendants.  
19

Case No. 2:16-cv-00831-RFB-BNW

**STIPULATION TO EXTEND THE  
TIME TO FILE DISMISSAL  
PAPERWORK**

20 Plaintiff Saul Farvela, by and through counsel, Travis N. Barrick, Esq., and  
21 Defendants Jay Barth and Kyle Groover, by and through counsel, Aaron D. Ford, Nevada  
22 Attorney General, and Jared M. Frost, Senior Deputy Attorney General, hereby stipulate  
23 and agree to extend the time to file dismissal paperwork for an additional thirty (30) days.

24 On June 28, 2019, the parties reached an agreement to settle this matter at a  
25 mediation conference overseen by the Court. ECF No. 40. Pursuant to the Court's Minute  
26 Order, the parties were to file dismissal paperwork by July 29, 2019. *Id.*

27 On July 3, 2019, defense counsel sent Plaintiff's counsel a proposed settlement  
28 agreement.

1 On July 9, 2019, defense counsel sent Plaintiff's counsel an amended proposed  
2 settlement agreement.

3 On July 16, 2019, defense counsel sent Plaintiff's counsel a second amended proposed  
4 settlement agreement after receiving additional feedback from Plaintiff's counsel. That  
5 same day, Plaintiff's counsel confirmed he had sent the proposed agreement to Plaintiff for  
6 signature.

7 As of the date of this filing, Plaintiff's counsel has not received the signed agreement  
8 from Plaintiff.

9 Consequently, the parties need an additional thirty (30) days to obtain all necessary  
10 signatures and file a stipulation to dismiss the case.

11 DATED this 26th day of July, 2019.

12 GALLIAN WELKER & BECKSTROM, LTD. AARON D. FORD  
13 Attorney General

14 By: /s/ Travis N. Barrick  
15 TRAVIS N. BARRICK, ESQ.  
16 Nevada Bar No. 9257  
540 E. St. Louis Avenue  
Las Vegas, Nevada 89104  
*Attorneys for Plaintiff*

By: /s/ Jared M. Frost  
JARED M. FROST, ESQ.  
Nevada Bar No. 11132  
555 E. Washington Avenue, Ste. 3900  
Las Vegas, Nevada 89101  
*Attorneys for Defendants Barth and Groover*

17  
18  
19 **IT IS SO ORDERED**

20 **DATED: July 30, 2019**

21  
22 

23  
24 **BRENDA WEKSLER**  
25 **UNITED STATES MAGISTRATE JUDGE**  
26  
27  
28